

REMARKS

Claims 101-127 are pending in the application. Claims 102, 104, 106, 107, 112, 115, 116, 117, 122, 123, and 127 have been amended. Claims 102, 104, 106, 112, 115, 116, 117, and 122 have been amended in the manner suggested by the Examiner, and it is respectfully submitted that, as amended, these claims overcome all claim objections raised in Paragraph 1 of the Office Action of November 25, 2003. Claims 106 and 107, as amended, overcome the rejections under 35 U.S.C. § 112, second paragraph raised in Paragraph 2 of the Office Action. Claims 123 and 127, as amended, more clearly recite the claimed subject matter. The amendments do not add any new matter.

35 U.S.C. § 103 Rejections

Claims 101-105, 111-112, and 116-122 were rejected under 35 U.S.C. § 103 as being allegedly unpatentable over the newly-cited reference Sugiyama et al., U.S. Patent No. 6,547,242. According to the Action, Sugiyama discloses a gaming method comprising displaying symbols on an array of images, determining whether a winning combination is present along a payline, determining whether a trigger symbol is present along the payline, determining whether the trigger symbol is present at a trigger site of the array, and providing an additional award. November 25 Office Action, at 3-4. However, nowhere does Sugiyama disclose or suggest providing one of an additional bonus event and an option of initiating an additional bonus event if said trigger symbol is present at said trigger site. It is also respectfully submitted that, contrary to the statement in the Action, the Sugiyama reference does not disclose determining whether a trigger symbol is present at a trigger site of the array and if so, providing an additional award.

Sugiyama discloses a reel-type game in which the array of images in Fig. 1 consists of the nine visible positions of the three reels 28 depicted on the video display. When a "special symbol 31" is present on a selected payline 32, regardless of the symbol's position on the

payline, that symbol is replicated into a matrix 30 at a cell position *of the matrix 30* corresponding to the position of that special symbol 31 on the reels 28. Col. 4, lines 36-44. In other words, the particular cell location, or a trigger site, is not a condition to the special symbol 31 being replicated in the matrix 30. Rather, the presence of the special symbol *anywhere* on the selected payline 32 is sufficient to cause the replication of that symbol on the matrix 30. As indicated in response to the previous Action, the determination in claims 101 and 112 of whether a trigger symbol, or a second triggering event, is present at a particular trigger site only requires interrogation of that one trigger site in order to reach an outcome as to that determination. The action described in Sugiyama et al. of replication on the matrix 30 of a special symbol 31 appearing on the selected payline 32, however, involves an interrogation of multiple image sites along the payline 32.

Moreover, the Action indicates "it would have been obvious to a person of ordinary skill in the art at the time the invention was made to replace chances of winning of Sugiyama with a well known bonus game in order to allow the player to continue playing another game for another award." This replacement would be directly contrary to the teachings of Sugiyama et al. The Sugiyama et al. reference specifically criticizes and distinguishes itself from "certain bonus games dependent on the primary reel game," as being "typically confusing and complicated for the player." Col. 1, lines 29-32. It is therefore respectfully submitted that claims 101 and 112, and all claims depending therefrom, are allowable over Sugiyama et al.

Claims 106-110, 113-115, and 123-127 were rejected under 35 U.S.C. § 103 as being allegedly unpatentable over the newly-cited reference Sugiyama et al., U.S. Patent No. 6,547,242, in view of another newly cited reference, Darby, US 2003/0130024. Inasmuch as claims 106-110 all depend from claim 101, claims 113-115 depend from claim 112, it is respectfully submitted that these claims are likewise allowable.

As to claim 123, this claim, as amended, is considered to be allowable over the proposed combination of Sugiyama et al. and Darby because the proposed combination of Sugiyama et al. and Darby would not result in what is recited in claim 123, as amended. In the Action, it is stated that "Darby further discloses permitting the player to select an image site along the bonus payline and replacing the symbol at each unselected image site with another symbol." The Applicants respectfully submit that there is no disclosure in the Darby reference of a bonus payline. The language referred to in the Action (paragraph 0033 of Darby) describes actions relative to a matrix, as opposed to a bonus payline.

The Action concedes that Sugiyama does not disclose providing a bonus event and an additional bonus event. Sugiyama does describe matrices on which symbols are generated at positions corresponding to positions where identical symbols appear on selected payline(s) on an array of nine visible positions of three reels. However, there is no suggestion or motivation to combine the Sugiyama and Darby references to enable a player to replace a symbol at at least one image site of at least one of one or more bonus paylines with a symbol generated from a group of symbols including a plurality of symbols different from the symbols displayed on the array of image sites and a plurality of symbols identical to the symbols displayed on the array of image sites, as recited in claim 123, as amended.

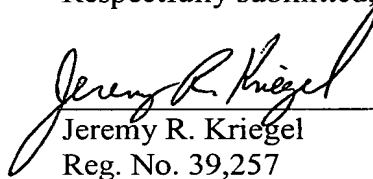
To the contrary, the so-called "corresponding" matrices of Sugiyama are described to have their positions filled in response to appearance of special symbols at locations on the array of visible positions of the three reels corresponding to previously un-filled positions of the matrices. The ability to replace symbols within a given line of any of the "corresponding" matrices of Sugiyama, or anywhere within such matrices for that matter, would not enable the player to get any closer to filling the un-occupied positions of the "corresponding" matrices. Thus the player would be no closer to receiving any benefits awarded by virtue of having filled the matrices, e.g. eligibility for play in another game. It is therefore respectfully

submitted that there is no suggestion to combine the Sugiyama and Darby references in the proposed manner, and that even if so combined, they would not result in what is recited in claim 123, as amended.

Claim 127 has been amended in light of the amendments to claim 123. All claims depending from claim 123 are submitted to be allowable over the newly-cited references relied upon for the same reasons as claim 123.

Inasmuch as all of the rejections of the latest Action are based on newly-cited references, it is respectfully requested that the finality of the Action be withdrawn (*see* MPEP 706.07(a)), and that the Examiner reconsider the rejections in view of the above amendments and arguments. The Examiner's favorable action is respectfully solicited.

Respectfully submitted,



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